

**UNITED STATES BANKRUPTCY  
COURT DISTRICT OF  
MASSACHUSETTS (CENTRAL  
DIVISION)**

**In re:**

**GEORGE L. COTE,**

**Debtor.**

**Chapter 7  
Case No. 15-42383-CJP**

**ANSWER OF DEBTOR'S ATTORNEY OF RECORD'S TO CHAPTER 7  
TRUSTEE'S MOTION TO DISMISS DEBTOR'S BANKRUPTCY CASE AND/OR  
AWARD ADMINISTRATIVE EXPENSES**

To the Honorable Christopher J. Panos, United States Bankruptcy Judge:

DEBTOR'S ATTORNEY OF RECORD, Robin L. Munson (Debtor's counsel), submits the following Answer in response to Trustee Joseph H. Baldiga's (the "trustee") Motion To Dismiss Debtor's Bankruptcy Case And/Or Award Administrative Expenses. In the best interest of the Debtor, George L. Cote, and in order to preserve the rights of the Debtor, Robin L. Munson requests that this Court deny Trustee's Motion to Dismiss and/or Award Administrative Expenses.

**ANSWER**

1. – 3. Debtor's Counsel affirms through actual knowledge or belief.
4. Affirm that Bankruptcy Code § 341(a) (the “§ 341(a) Meeting”) was scheduled for January 13, 2016 at 10 a.m., and that Debtor and his Counsel did not appear. Debtor's Counsel has no actual knowledge or belief regarding Trustee's time of receipt of fax but does assert that

she sent the fax on or around 2 p.m. of January 13, 2016. Debtor's Counsel was requested by her supervisor, Northeast Legal Aid Assistant Director, Stefanie Balandis, to not send the request until she (the Assistant Director) had the chance to review and edit it, which took until early afternoon. Affirm that Debtor's Counsel received and confirmed receipt of email advising of continued date and time of meeting.

5. Affirm through Debtor's Counsel's actual knowledge or belief.
6. Unable to confirm or deny.
7. Affirm through Debtor's Counsel's actual knowledge or belief.

RESPECTFULLY, in the best interest of the Debtor and to preserve Debtor's rights, Debtor's Counsel requests that this Court deny Trustee's Motion to Dismiss Debtor's Bankruptcy Case. In addition, Debtor's Counsel asks that Debtor not be assessed administrative expenses of \$750.00 as Debtor is on a fixed SSDI income.

Submitted this day, April 9, 2016, by :



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Robin L. Munson

Munson Law Offices  
25 Central Street, Unit 4  
Lowell, MA 01854  
MA Bar # 672996  
978-735-4574

**CERTIFICATE OF SERVICE**

I, Robin L. Munson, do hereby certify that on this day, April 9, 2016, I did serve a true and accurate copy of the above pleading upon those persons registered with the Court's ECF system, pursuant to the ECF system:

Richard T. King, Esq.  
Assistant U.S. Trustee  
Office of U.S. Trustee  
446 Main Street, 14th Floor  
Worcester, MA 01608

Joseph H. Baldiga  
BBO #549963  
Mirick, O'Connell, DeMallie & Lougee, LLP  
1800 West Park Drive, Suite 400  
Westborough, MA 01581-3926

Additionally I served a true and accurate copy of the pleading upon those persons listed immediately below by first class mail postage prepaid on this day, April 9, 2016:

Commonwealth of Massachusetts  
Department of Revenue Litigation  
Bureau, Bankruptcy Unit  
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Internal Revenue Service Special  
Process Unit  
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Boston, MA 02203

Internal Revenue Service  
Centralized Insolvency Operation  
PO Box 7346  
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